

# **EXHIBIT U**

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In the Matter of:

THE STATE OF WASHINGTON

vs.

THE GEO GROUP, INC.

IOLANI MENZA

June 27, 2019



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IOLANI MENZA; June 27, 2019

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEPOSITION UPON ORAL EXAMINATION

QF

TOTIANT MENZA

9:54 a.m.  
June 27, 2019

1250 Pacific Avenue 105  
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLWS, CCR 2297



IOLANI MENZA; June 27, 2019

2

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IOLANI MENZA; June 27, 2019

3

I N D E X		PAGE
2	EXAMINATION BY:	
3	Ms. Chien -----	5
4		
5		
6	EXHIBITS FOR IDENTIFICATION	PAGE
7	Exhibit 224 Specific Post Orders, GEO-State 044392 - 044414	84
8	Exhibit 225 OJT for new Laundry Supervisors, "Confidential," GEO-State 023610 - 023618	92
9		
10	Exhibit 226 Memorandum, 8-24-11, "Confidential," GEO-State 020012	95
11		
12	Exhibit 227 Email, 5-15-17, "Confidential," GEO-State 242922 - 242924	96
13		
14	Exhibit 228 Daily Detainee Worker Pay Sheet, "Confidential," GEO-State 033236	98
15		
16	Exhibit 229 Volunteer Work Program Agreement, GEO-State 015834	100
17		
18	Exhibit 230 Volunteer Work Program Agreement, Spanish-language version, GEO-State 015835	101
19		
20	Exhibit 231 Laundry Detail, "Confidential," GEO-State 241705 - 241706	101
21		
22	Exhibit 232 Daily Work Crew Count Sheet, "Confidential, Subject to Protective Order," GEO-State 233578 - 233581	102
23		
24	Exhibit 233 Photocopy of color photograph, laundry area, "Confidential,"	108
25		
	Exhibit 234 Photocopy of color photograph, laundry area, "Confidential,"	111



IOLANI MENZA; June 27, 2019

4

	EXHIBITS FOR IDENTIFICATION	PAGE
1	Exhibit 235 Photocopy of color photograph, laundry area, "Confidential,"	113
2	Exhibit 236 Photocopy of color photograph, laundry area, "Confidential,"	115
3	Exhibit 237 Photocopy of color photograph, laundry area, "Confidential,"	119
4	Exhibit 238 Photocopy of color photograph, laundry area, "Confidential,"	120
5	Exhibit 239 Photocopy of color photograph, laundry area, "Confidential,"	122
6	Exhibit 240 Photocopy of color photograph, laundry area, "Confidential,"	125
7	Exhibit 241 Photocopy of color photograph, laundry area, "Confidential,"	126
8	Exhibit 242 Photocopy of color photograph, laundry area, "Confidential,"	127
9	Exhibit 243 Photocopy of color photograph, laundry area, "Confidential,"	128
10	Exhibit 244 Photocopy of color photograph, laundry area, "Confidential,"	130
11	Exhibit 245 Photocopy of color photograph, laundry area, "Confidential,"	131
12	Exhibit 246 Photocopy of color photograph, laundry area, "Confidential,"	132
13	Exhibit 247 Photocopy of color photograph, laundry area, "Confidential,"	135
14	Exhibit 248 Photocopy of color photograph, laundry area, "Confidential,"	136
15	Exhibit 249 Photocopy of color photograph, laundry area, "Confidential,"	137
16	Exhibit 250 Photocopy of color photograph, laundry area, "Confidential,"	139



IOLANI MENZA; June 27, 2019

5

1 | Tacoma, Washington; June 27, 2019

2 | 9:54 a.m.

3 | ---oo---

4

5 IOLANI MENZA,

6 sworn as a witness by the certified court reporter,

7 | testified as follows:

8

9 | EXAMINATION

10 | BY MS. CHIEN:

11 Q. Can you say your name for the record?

12 A. Iolani Menza.

13 Q. Iolani Menza, that will help me be able to  
14 pronounce it correctly. My name is Marsha Chien. I  
15 represent the State of Washington. And we're about to  
16 take your deposition. And is there anything that would  
17 cause you concern that you wouldn't be able to my  
18 questions accurately?

19 A. No.

20 Q. Have you had your deposition taken before?

21           A.    I was in court once.  I've never been in a  
22 room like this.

23 Q. With a court reporter or anything like that?

24 You've never been in a room with a court reporter --

25 A. No.



IOLANI MENZA; June 27, 2019

53

1 MS. ASAII: Object to the form.

2 A. It didn't change.

3 Q (By Ms. Chien) Did you have to work harder?

4 MS. ASAII: Object to the form.

5 A. I still did the laundry. I didn't work harder  
6 or not harder. It's just the same thing as every day.

7 Q. So there are three or four detainee workers  
8 generally on the laundry shift. What was each detainee  
9 assigned?

10 A. There was no specific jobs assigned.

11 Everybody would just do whatever they wanted, basically.  
12 If you wanted to fold or put away clothes, you'd put  
13 away clothes. If you wanted to wash clothes, you'd wash  
14 clothes. I mean . . .

15 Q. So when you came -- when detainee workers  
16 came, they could decide what they would work on?

17 A. Pretty much what we had to get done is what  
18 the task was. So if he wanted to load 'cause he likes  
19 loading, he would load. If he likes to unload 'cause he  
20 likes unloading, he would unload. I can't tell you --

21 Q. Did you tell -- who told them what they had to  
22 do that day?

23 A. That would be me.

24 Q. The laundry officer tells the detainee workers  
25 what they need to do each day?



IOLANI MENZA; June 27, 2019

69

1 A. Yeah.

2 Q. But then there were also new detainee workers  
3 that came on while you were laundry officer; is that  
4 right?

5 A. Yes.

6 Q. How did you get those new detainee workers?

7 A. I had a list of individuals that were on the  
8 standby waiting list. I called their officer at the pod  
9 they stayed in and had their officer ask them if they  
10 would like to work with me in the laundry room. They  
11 either said yes or no.

12 Q. Did you ever get to choose which detainee  
13 workers you would prefer to work in the laundry?

14 A. The process is the way I called for workers.  
15 I never chose.

16 Q. Did you have any preferences? Like if you  
17 could choose, were there some detainee workers that were  
18 better than others?

19 A. I would just go by the list. So . . .

20 Q. I mean about their work product, how they  
21 worked. They all worked the same?

22 A. No. They -- everybody has different  
23 personalities. Everybody is different. As long as they  
24 got the job done, that's fine with me.

25 Q. Did you ever have to call classification to



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96

1 had a couple questions. It says "laundry POA." Does  
2 "POA" mean anything to you?

3 A. I have no clue what that means.

4 Q. Are you familiar with a detainee worker by the  
5 last name of Medina?

6 MS. ASAII: I'll object. We'll be marking  
7 portions of the transcript as confidential when we're  
8 naming detainees.

9 You can answer.

10 A. (Shrugs.)

11 Q (By Ms. Chien) No?

12 A. Sorry. I'm sure that's not a unique name.

13 Q. Who hires laundry detainee workers?

14 A. Like I said, I just go off the list. So  
15 whatever's on the list is who I call their officer and  
16 see if they want to work. I don't hire any individuals.  
17 They're on the list, waiting to be -- it's not up to me  
18 to hire or -- you know what I mean?

19 Q. Yeah. Okay. I'm going to hand you a document  
20 I'd like to be marked as Exhibit 227.

21 (Deposition Exhibit No. 227 marked for  
22 identification.)

23 Q (By Ms. Chien) Do you see that this is an  
24 email from Mike Heye, dated May 15, 2017? It says "The  
25 laundry officers do the hiring," the first line after



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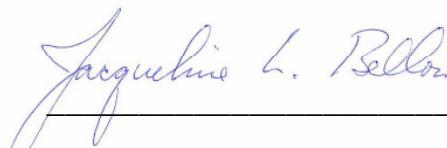
IOLANI MENZA; June 27, 2019

143

## 1 REPORTER'S CERTIFICATE

2 I, JACQUELINE L. BELLWS, the undersigned  
3 Certified Court Reporter pursuant to RCW 5.28.010 authorized  
4 to administer oaths and affirmations in and for the State of  
5 Washington, do hereby certify that the sworn testimony  
6 and/or proceedings, a transcript of which is attached, was  
7 given before me at the time and place stated therein; that  
8 any and/or all witness(es) were duly sworn to testify to the  
9 truth; that the sworn testimony and/or proceedings were by  
10 me stenographically recorded and transcribed under my  
11 supervision, to the best of my ability; that the foregoing  
12 transcript contains a full, true, and accurate record of all  
13 the sworn testimony and/or proceedings given and occurring  
14 at the time and place stated in the transcript; that a  
15 review of which was requested; that I am in no way related  
16 to any party to the matter, nor to any counsel, nor do I  
17 have any financial interest in the event of the cause.

18 WITNESS MY HAND AND DIGITAL SIGNATURE this 1st  
19 day of July, 2019.

20  
21   
22

23 Jacqueline L. Bellows  
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